

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLIN

UNITED STATES OF AMERICA

v.

FERNANDO ISMAEL OVIEDO : 1:22CR 25 -1

ROSALBA PRENSA RODRIGUEZ : 1:22CR_25_-2

XION MARCUIS MCKINNEY : 1:22CR_25_-3

KEONDRE TYRELL JACKSON : 1:22CR_25_-4
AMBER MARRIE ROGERS : 1:22CR_25_-5

LINARDO SANTOS-QUEZADA : 1:22CR 25 -6

PEGGY BRIANA RANDOLPH : 1:22CR 25 -7

TIANIA DENISE ASHE : 1:22CR 25 -8

ANGEL MICHELLE WERT : 1:22CR 25 -9

CRYSTAL KAY FORREST : 1:22CR 25 -10

STEPHANIE JANE HICKMAN : 1:22CR 25 -11

KENNETH EDWARD MATHENY : 1:22CR 25 -12

MARVIN JEROME MILLER : 1:22CR 25 -13

JOSE IGNACIO ANORVE FIGUEROA: 1:22CR 25 -14

The Grand Jury charges:

From on or about August 19, 2020, continuing up to and including on or about February 1, 2022, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, and elsewhere, FERNANDO ISMAEL OVIEDO, ROSALBA PRENSA RODRIGUEZ, XION MARCUIS MCKINNEY, KEONDRE TYRELL JACKSON, AMBER MARRIE ROGERS, LINARDO SANTOS-QUEZADA, PEGGY BRIANA RANDOLPH, TIANIA DENISE ASHE, ANGEL MICHELLE WERT, CRYSTAL KAY

FORREST, STEPHANIE JANE HICKMAN, KENNETH EDWARD MATHENY, MARVIN JEROME MILLER, JOSE IGNACIO ANORVE FIGUEROA, and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine, confederate, and agree together and with each other to commit offenses against the laws of the United States, that is:

- 1. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);
- 2. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);
- 3. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1); and

4. To knowingly, intentionally, and unlawfully possess with intent to distribute quantities of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1).

Quantities of Controlled Substances Involved in the Conspiracy

With respect to FERNANDO ISMAEL OVIEDO, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture and substance containing a detectable amount of cocaine, 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to ROSALBA PRENSA RODRIGUEZ, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to XION MARCUIS MCKINNEY, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, 500 grams or more of a mixture and substance containing a detectable amount of heroin, and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to KEONDRE TYRELL JACKSON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to AMBER MARRIE ROGERS, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to LINARDO SANTOS-QUEZADA, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine. With respect to PEGGY BRIANA RANDOLPH, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to TIANIA DENISE ASHE, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to ANGEL MICHELLE WERT, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to STEPHANIE JANE HICKMAN, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to MARVIN JEROME MILLER, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct

of other conspirators reasonably foreseeable to him, is 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

With respect to JOSE IGNACIO ANORVE FIGUEROA, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A) and 841(b)(1)(B).

DATED: February 22, 2022

SANDRA J. HAIRSTON United States Attorney

BY: JACOB D. PRYOR

Assistant United States Attorney

A TRUE BILL: 1